

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**GOVERNMENT'S MOTION TO SEAL ITS FORTHCOMING MOTION *IN LIMINE* TO  
PRECLUDE CROSS-EXAMINATION OF GOVERNMENT WITNESSES  
REGARDING CRIMINAL OFFENSES**

The government respectfully requests leave to file under seal Exhibits A through C of its forthcoming Motion *in Limine* to Preclude Cross-Examination of Government Witnesses Regarding Criminal Offenses.

These exhibits consist of the criminal records of three individuals that the government anticipates calling at the upcoming trial. To protect these witnesses from embarrassment and to prevent these records from becoming a part of the public record, the government respectfully requests leave to file these exhibits under seal.

Pursuant to Local Rule 7.1, the government has conferred with counsel for Kingsley Chin regarding the relief requested in this motion. Chin does not oppose the motion to seal, but reserves the right to seek to unseal these materials at a later date.

Dated: April 11, 2025

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

LEAH B. FOLEY  
United States Attorney

/s/ Chris Looney  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that I caused this document to be filed through the ECF system on April 11, 2025.

/s/ Chris Looney  
CHRISTOPHER LOONEY